1 | Carolyn H. Cottrell (SBN 166977)
2 | Ori Edelstein (SBN 268145)
Eugene Zinovyev (SBN 267245)
SCHNEIDER WALLACE
3 | **COTTRELL KONECKY LLP**
2000 Powell Street, Suite 1400
4 | Emeryville, California 94608
Telephone: (415) 421-7100
5 | ccottrell@schneiderwallace.com
oedelstein@schneiderwallace.com
6 | ezinovyev@schneiderwallace.com

7 | *Attorneys for Plaintiff*
TIFFENY NANCE

8 | [*Additional Counsel Listed on Following Page*]

9 |

10 | **UNITED STATES DISTRICT COURT**

11 | **EASTERN DISTRICT OF CALIFORNIA**

12 TIFFENY NANCE, on behalf of herself and the Class Members,	Case No. 2:23-cv-00477-TLN-JDP
13	[Assigned to the Honorable Troy L. Nunley]
14 Plaintiff,	
15 vs.	**STIPULATION AND ORDER TO STAY DISCOVERY FOR THIRTY DAYS**
16 RYDER INTEGRATED LOGISTICS, INC., a Delaware Corporation; and RYDER SYSTEM, INC., a Florida Corporation,	
17	Complaint Filed: March 13, 2023
18 Defendants.	Trial Date: None
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1 Mara D. Curtis (SBN 268869)
   mcurtis@reedsmith.com
2 Rafael N. Tumanyan (SBN 295402)
   mcurtis@reedsmith.com
3 Tanner J. Hendershot (SBN 346841)
   thendershot@reedsmith.com
4 REED SMITH LLP
   355 South Grand Avenue, Suite 2900
5 Los Angeles, CA 90071-1514
   Telephone: +1 213 457 8000
6 Facsimile: +1 213 457 8080

7 Attorneys for Defendants
   RYDER INTEGRATED LOGISTICS, INC.
8 and RYDER SYSTEM, INC.

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CASE NO.: 2:23-cv-00477-TLN-JDP   2   STIPULATION AND ORDER TO STAY
NANCE V. RYDER INTEGRATED LOGISTICS, INC.   DISCOVERY FOR THIRTY DAYS

1   Plaintiff Tiffeny Nance ("Plaintiff") and Defendants Ryder Integrated Logistics, Inc.

2 and Ryder System, Inc. (collectively, "Ryder") (together the "Parties"), by and through their

3 undersigned counsel, hereby enter into the below stipulation with reference to the following

4 facts:

5   WHEREAS, on March 13, 2023, Plaintiff filed her class-action complaint for

6 damages against Ryder in the United States District Court for the Eastern District of

7 California, captioned *Tiffeny Nance v. Ryder Integrated Logistics, Inc. et al.*, Case No.

8 2:23-cv-00477 (Plaintiff's "Class Action");

9   WHEREAS, as relevant here, there are currently two related cases pending

10 against Ryder in the United States District Court for the Northern District of California:

11 *Perkins v. Hadco Santa Fe Springs CA dba Ryder Integrated Logistics, Inc.*, Case No.

12 3:23-cv-00502-WHO & 3:23-cv-01694-WHO ("*Perkins*") and *Jose Johnson, et al. v.*

13 *Ryder Transp. Solutions, LLC*, Case No. 4:22-cv- 07456-JST ("*Johnson*");

14   WHEREAS, on October 24, 2023, Ryder and the parties in the *Perkins* and

15 *Johnson* actions participated in a successful mediation and agreed to a settlement in

16 principle that, by definition, Ryder states encompasses the putative class and claims

17 alleged in Plaintiff's Class Action;

18   WHEREAS, the Parties previously stipulated to extend the Phase I Discovery

19 Cutoff deadline by sixty days to March 12, 2024; and

20   WHEREAS, the Parties have agreed to stay discovery in this case by thirty days

21 in exchange for Ryder providing the executed Settlement Agreement to counsel in this

22 case when it is fully executed, to give the Parties time to meet and confer regarding the

23 impact of the *Perkins/Johnson* settlement on this case.

24   IT IS HEREBY JOINTLY STIPULATED AND AGREED, by and between the

25 Parties through their respective counsel of record that:

26   1.   The Parties agree that this Court enter an Order to stay all current and

27 pending discovery in this case for thirty days.

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2 **IT IS SO STIPULATED.**

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4 Dated: January 3, 2024   SCHNEIDER WALLACE
                                       COTTRELL KONECKY LLP

5

6   By: /s/ Eugene Zinovyev

7   Carolyn H. Cottrell
                                     Ori Edelstein

8   Eugene Zinovyev
                                     Attorneys for Plaintiff

9   TIFFENY NANCE

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12 Dated: January 3, 2024   REED SMITH LLP

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14   By: /s/ Tanner J. Hendershot

15   Mara D. Curtis
                                     Rafael N. Tumanyan
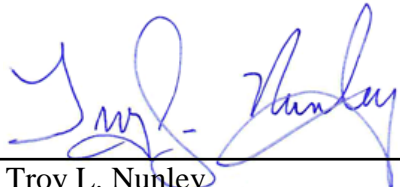
16   Tanner J. Hendershot
                                     Attorneys for Defendants

17   RYDER INTEGRATED LOGISTICS, INC.
                                     and RYDER SYSTEM, INC.

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ORDER

2   Pursuant to the above Stipulation, and good cause appearing, **IT IS SO**

3 **ORDERED** as follows:

4   1.   All current and pending discovery in this case is stayed for thirty days.

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6   Dated: January 3, 2024

7   _____

8   Troy L. Nunley
                                                                                      United States District Judge

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